



U.S. Department of Justice

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United States Attorney
District of Massachusetts

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U.S. DEPARTMENT OF JUSTICE
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October 7, 2005

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34 Bridge Street
South Hadley, MA 01075

Re: United States v. Albert Innarelli, et al.
CR-N-04-30046-MAP

Dear Counsel:

This letter shall respond to your requests for automatic discovery under the Local Rules.

A. Discovery Pursuant to Fed.R.Crim.Pro. 16(a)(1)(A) - (D)

1. Statements of the Defendants

- a. IRS Memorandum of Interview of Albert Innarelli, dated 04/24/02 (1 page);
- b. IRS Memorandum of Interview of Albert Innarelli, dated 05/21/02 (4 pages);
- c. IRS Memorandum of Activity of Albert Innarelli, dated 05/21/02 (2 pages);

- d. IRS Memorandum of Interview of Albert Innarelli, dated 05/30/02 (2 pages);
- e. Grand Jury Testimony of Albert Innarelli, dated 06/06/02 (5 pages);
- f. IRS Memorandum of Interview of Michael Bergdoll, dated 01/17/03 (2 pages);
- g. IRS Memorandum of Interview of Michael Bergdoll, dated 02/13/03 (1 pages);
- h. IRS Memorandum of Interview of Michael Bergdoll, dated 03/12/03 (5 pages);
- i. IRS Arrest Report for Michael Bergdoll, dated 09/23/04 (2 pages);
- j. IRS Memorandum of Interview of Anthony Matos, dated 09/30/02 (1 pages);
- k. IRS Memorandum of Interview of Anthony Matos, dated 02/06/03 (1 page);
- l. Handwriting exemplars of Anthony Matos, dated 02/13/03 (9 pages);
- m. Grand Jury Testimony of Anthony Matos, dated 10/10/02 (5 pages);
- n. Grand Jury Testimony of Theodore Jarrett, dated 09/07/00 (13 pages);
- o. IRS Memorandum of Interview of Theodore Jarrett, dated 05/01/03 (3 pages);
- p. Grand Jury Testimony of Theodore Jarrett, dated 05/09/02 (52 pages);
- q. FBI 302 of James Smith, dated 01/08/03 (1 page);
- r. Massachusetts State Police Report, dated 01/05/00, for Joseph Sullivan (1 page);
- s. Massachusetts State Police Report, dated 07/24/00, for Joseph Sullivan (1 page);

- t. Massachusetts State Police Report, dated 11/15/00, for Joseph Sullivan (1 page);
- u. Massachusetts State Police Report, dated 01/19/01, for Joseph Sullivan (1 page); and,
- v. IRS Memorandum of Interview of Joseph Sullivan, dated 10/02/02 (2 pages).
- w. IRS Memorandum of Interview of Edgar Corona, dated 11/13/03 (4 pages);
- x. IRS Memorandum of Interview of Kathryn Zepka, dated 09/05/02 (3 pages); and,
- y. IRS Memorandum of Interview of Kathryn Zepka, dated 02/19/03 (2 pages).

2. Defendants' Prior Record

NCIC printouts of all defendants enclosed.

3. Documents and Tangible Objects

The IRS is currently in possession of loan files, seized documents, documents, imaged computer hard drives, photographs and other tangible objects received pursuant to grand jury subpoena, search warrant, and/or consent search. Please schedule an appointment with this office to arrange for a review of these materials.

After a review of these materials, you may designate those documents that you wish to have copied. Copies may be obtained by making arrangements with a local copy center.

4. Reports of Examinations and Tests

None.

B. Search Materials

1. Search Warrant Applications, Affidavits, and Returns

1113 Main Street - Search No. 02m629

- a. Search warrant and inventory;

b. Search warrant application and affidavit;

1113 Main Street - Search No. 02m633

a. Search warrant and inventory;

b. Search warrant application and affidavit;

10 Beechwood Drive - Search No. 03m607

a. Search warrant and inventory;

b. Search warrant application and affidavit;

494 Central - Search No. 04m620KPN

a. Search warrant and inventory;

b. Search warrant application and affidavit;

89 Hall Street - Search No. 04m621KPN

a. Search warrant and inventory;

b. Search warrant application and affidavit;

2. Written Description of Consent Searches and Inventory

None.

C. Electronic Surveillance

1. Written Description of Any Intercept

None.

2. Statement Whether or Not the Government Intends to Offer Intercepts in its Case-in-Chief

Not Applicable.

3. Title III Applications, Affidavit, and Court Orders

None.

D. Consensual Intercepts

1. Written Description of Any Intercept

This information will be supplied under separate cover.

E. Known Unindicted Co-conspirators

This information will be supplied under separate cover.

F. Identifications

**1. Written Statement Whether or Not Used for Any
Witness**

None.

2. Evidence Reflecting Identification Procedure

None.

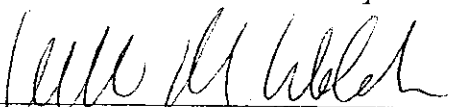
G. Exculpatory Information, Promises, Rewards or Inducements

This information will be supplied under separate cover.

Very truly yours,

MICHAEL J. SULLIVAN
United States Attorney

By:


WILLIAM M. WELCH II
Assistant United States Attorney

enc.

cc: Court clerk